

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT WASHINGTON  
AT SEATTLE

KENNETH I. DEANE,

Plaintiff,

vs.

PACIFIC FINANCIAL GROUP, Inc., a  
Washington corporation, MEGAN P. MEADE,  
an unmarried woman; NICOLAS B. SCALZO,  
a married man; NICOLAS B. SCALZO and  
EVA M. SCALZO, a marital community;  
JAMES C. MCCLENDON, a married man;  
JAMES C. MCCLENDON and JOAN A.  
MCCLENDON, a marital community;  
GAETAN T. SCALZO, a married man;  
GAETAN T. SCALZO and SHERRIE  
SCALZO, a marital community,

Defendants.

Cause No. 2:19-cv-00722-MJP

**AMENDED STIPULATED MOTION  
FOR DISCOVERY CONTINUANCE  
AND ORDER [PROPOSED]**

**NOTED ON MOTION CALENDAR:  
THURSDAY, FEBRUARY 27, 2020**

**I. Joint Motion and Stipulation**

Plaintiff Kenneth Deane (“Plaintiff”) and Defendants The Pacific Financial Group, Megan Meade, Nicolas Scalzo, James McClendon, Gaetan Scalzo, and Sherrie Scalzo (“Defendants”), by and through their respective counsel, stipulate and jointly move the Court to

STIPULATED MOTION FOR DISCOVERY  
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grant a continuance of discovery deadlines to allow more time to complete additional discovery before the trial date scheduled for July 13, 2020. The parties have exchanged initial discovery requests and transmitted supplemental requests.

Good cause to continue the discovery deadlines exists as initial discovery has revealed the need to seek further discovery from the parties as well as third parties. Additionally, plaintiff's counsel has had substantial administrative issues as a result of a change in staff that has delayed the answers and responses to timely discovery. These issues have now been resolved.

Event	Current Deadline	Proposed Deadline
Disclosure of expert testimony under FRCP 26(a)(2)	12/16/19	03/16/20
All motions related to discovery	01/15/20	03/16/20
Discovery cutoff	02/14/20	04/14/20
Dispositive motions	03/16/20	04/16/20

The parties have consented to this postponement. The parties, by and through their undersigned counsel, stipulate to this motion and the following proposed order.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 26<sup>th</sup> day of February, 2020.

GORDON REES SCULLY  
MANSUKHANI LLP

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Attorneys for Defendants:

Pacific Financial Group, Inc.;  
Megan P. Meade; Nicholas B. Scalzo and  
Eva M. Scalzo; James C. McClendon and  
Joan A. McClendon; and Gaetan T. Scalzo and  
Sherrie Scalzo

By: /s/ Jon Howard Rosen

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Attorney for Plaintiff

Kenneth Deane

**PROPOSED ORDER**

Based on the foregoing joint motion of the parties, and good cause appearing, therefore,  
IT IS HEREBY ORDERED THAT the discovery deadlines be moved as follows:

Event	Current Deadline	Proposed Deadline
Disclosure of expert testimony under FRCP 26(a)(2)	12/16/19	03/16/20
All motions related to discovery	01/15/20	03/16/20
Discovery cutoff	02/14/20	04/14/20
Dispositive motions	03/16/20	04/16/20

DATED this \_\_\_\_\_ day of February, 2020.

\_\_\_\_\_  
THE HONORABLE MARSHA J. PECHMAN  
U.S. DISTRICT COURT JUDGE

Presented by:

GORDON REES SCULLY MANSUKHANI, LLP

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Joan A. McClendon; and Gaetan T. Scalzo and  
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